

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION

IN RE: GERALD A. BENDER, SR. )  
PATRICIA A. BENDER ) CHAPTER 13  
**Debtor(s)** )  
 ) CASE NO. 08-21193 (REF)  
AMERICREDIT FINANCIAL SERVICES, )  
INC. )  
**Moving Party** )  
vs. )  
 )  
GERALD A. BENDER, SR. )  
PATRICIA A. BENDER )  
**Respondent(s)** )  
 )  
FREDERICK L. REIGLE )  
**Trustee** )

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**REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Bankruptcy Rule 7034 and F.R.Civ. P.34, Movant hereby requests the respondents/debtors to produce any and all documents requested herein, for purposes of inspection and copying or, in lieu thereof, to produce those same documents, or true and legible copies, by mail or other similarly reliable means to the law offices of Morton & Craig LLC for purposes of inspection and copying.

1. If you deny any or all of the subsections under Movant's Request For Admissions, please produce any and all copies of payments, proof of payments, or any other documentation evidencing that payments were made to Movant for the post-petition payments due post-petition to AmeriCredit for the months of December 2008 through November 2009, including but not limited to canceled checks, receipts, proof of money orders and copies of bank account statements.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Movant's Request For Admissions.

Respectfully submitted:

/s/ William E. Craig

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Dated: 12/10/09